



February 24, 2014

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Amendment of the Commission's Rules Related to Retransmission Consent, MB Docket No. 10-71; 2010 Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 09-182

Dear Ms. Dortch:

On May 28, 2010, USA Companies, filed an ex parte letter in the above referenced docket stating that our average carriage fee paid to separately owned, same market stations affiliated with Big 4 networks that coordinated their retransmission consent negotiations was 133% higher than our average fee paid to stations affiliated with Big 4 networks that did not engage in coordinated negotiations.¹

At the time we filed our letter, we described our methodology as having included the examination of Big 4 stations that elected either retransmission consent or must carry.² In response to a recent inquiry concerning whether any of the Big 4 stations used in our analysis actually elected must carry, we reviewed our records. With this letter we clarify that in 2010 we included Big 4 stations that elected must carry in our calculation as paying a retransmission consent fee of zero. We believe this treatment of the data was appropriate. However, we conducted the calculation again including only Big 4 stations that elected retransmission consent and found that the average retransmission consent fee for Big 4 stations coordinating their retransmission consent negotiations was 43% higher than for separately negotiated stations.

We request that this letter, which is being filed electronically, be placed in the file of the above-captioned proceeding.

Respectfully submitted,

Stuart Gilbertson
Chief Operating Officer
USA Companies
920 E 56th Street, Suite B
Kearney, NE 68847

¹ Letter from Christian M. Hilliard, President, USA Companies, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 10-71 (filed May 28, 2010).

² Id. at 1 n.1.